

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X
UNITED STATES OF AMERICA,	:
- v. -	: 13 Cr. 31 (KBF)
ISAIAS FLORES-MENDEZ,	:
a/k/a "Jesus Diaz,"	:
a/k/a "Adrian Sanchez-Mendez,"	:
Defendant.	:
	:
	X

GOVERNMENT'S SENTENCING MEMORANDUM

PREET BHARARA
United States Attorney for the Southern
District of New York,
Attorney for the United States of America

JASON WONG
Special Assistant United States Attorney
-Of Counsel-



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building

*One Saint Andrew's Plaza
New York, New York 10007*

April 24, 2013

VIA ECF

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Isaias Flores-Mendez,
13 Cr. 31 (KBF)

Dear Judge Forrest:

The defendant is scheduled to be sentenced in the above-referenced case, charging a violation of 8 U.S.C. § 1326(a), on April 26, 2013, at 4:00 p.m. The Government has reviewed the Presentencing Report submitted by the United States Probation Department and has no objections to the report. The defendant has six convictions in the United States, including convictions for promoting prostitution and possession of a forged instrument. The defendant has also already been removed from the United States on three occasions. The Government submits that a Guidelines Sentence would be sufficient but not greater than necessary to serve the legitimate purposes of sentencing.

Respectfully submitted,

PREET BHARARA
United States Attorney
Southern District of New York

By: _____ /s/

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Via ECF

cc: S. Michael Musa-Obregon, Esq.
Attorney for Defendant